

Nicholas Ranallo, Attorney at Law (SBN 275016)
 2443 Fillmore St., #380-7508
 San Francisco, CA 94115-1814
nick@ranallolawoffice.com
 P: (831) 607-9229
 F: (831) 533-5073

Todd Y. Brandt (TX SB # 24027051) (*pro hac vice* pending)
 BRANDT LAW FIRM
 222 North Fredonia St.
 Longview, Texas 75601
 Tel: (903) 212-3130
 Fax: (903) 753-6761
 Email: tbrandt@thebrandtlawfirm.com

Attorney for Plaintiff
Secure Cam, LLC

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

Secure Cam, LLC, a Wyoming Limited Liability Company)	Case No. 5:18-cv-02407-EJD
)	
Plaintiff,)	
v.)	EX PARTE APPLICATION TO
)	CONTINUE INITIAL CMC TO AUGUST
Anviz Global, Inc.)	9, 2018; [PROPOSED] ORDER
)	
Defendant.)	
)	

**TO THE CLERK OF THE COURT AND ALL PARTIES PREVIOUSLY
 APPEARING:**

Pursuant to Civil Local Rule 7-10, Plaintiff Secure Cam, LLC by and through its undersigned counsel, hereby requests that the initial Case Management Conference in this matter, currently set for August 2, 2018 at 10:00 a.m. be continued for seven days to August 9, 2018 at 10:00 a.m. for the reasons described further herein.

1 Plaintiff Secure Cam, LLC presently has three matters pending before Honorable
2 Judge Edward Davila. These include the instant matter, as well as *Secure Cam, LLC v.*
3 *Butterfleye, Inc.* (5:18-cv-02600-EJD)(“Butterfleye”) and *Secure Cam, LLC v. Tend*
4 *Insights, LLC* (5:18-cv-2750-EJD)(“Tend”). The case management conferences for Tend
5 is presently set for August 9, 2018 at 10:00 and counsel for Tend has indicated that it cannot
6 move the August 9th CMC to August 2nd.
7

8 Plaintiff seeks to hold the relevant CMCs for all three cases on the same date, in an
9 effort to conserve the resources of counsel and the judiciary. As such, Secure Cam, LLC
10 hereby requests that the CMC in this matter be reset to August 9, 2018, to coincide with the
11 previously scheduled CMC in Tend. Though *Anviz* has been served in this matter, it has
12 not yet answered.
13

14 Secure Cam, LLC will concurrently file a request in Butterfleye to continue the CMC
15 in that matter to August 9, 2018 as well.
16

17 The above-stated facts are set forth in the accompanying Declaration of Nicholas
18 Ranallo in Support of Ex Parte Application to Continue Case Management Conference,
19 filed concurrently herewith.
20

21 Dated: July 17, 2018

Respectfully submitted,

22 /s/ Nicholas Ranallo

23 Nicholas Ranallo, Attorney at Law
24 2443 Fillmore St., #380-7508
25 San Francisco, CA 94115-1814
26 nick@ranallolawoffice.com
27 P: (831) 607-9229
28 F: (831) 533-5073

[PROPOSED] ORDER CONTINUING CASE MANAGEMENT CONFERENCE

Based on the foregoing Ex Parte Application for Continuance of Case Management Conference and Declaration of Nicholas Ranallo submitted in connection therewith, and good cause being shown, the Court orders a continuance of the initial Case Management Conference in this matter from August 2, 2018 at 10:00 a.m. to August 9, 2018, at 10:00 a.m. A Joint Case Management Statement shall be due on August 2, 2018.

SO ORDERED.

Dated ____ of July, 2018

Hon. Edward J. Davila
U.S. District Judge